

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC., and AMAZON DATA  
SERVICES, INC.,

Plaintiffs,

v.

Case No. 1:20 Civ. 484

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN  
WATSON; STERLING NCP FF, LLC;  
MANASSAS NCP FF, LLC; NSIPI  
ADMINISTRATIVE MANAGER; NOVA WPC  
LLC; WHITE PEAKS CAPITAL LLC;  
VILLANOVA TRUST; CARLETON NELSON;  
CASEY KIRSCHNER; ALLCORE  
DEVELOPMENT LLC; FINBRIT HOLDINGS  
LLC; CHESHIRE VENTURES LLC; JOHN  
DOES 1-20,

Defendants.

**WAIVER OF ORAL ARGUMENT**

Pursuant to Local Civil Rule 7(E), Defendants Carleton Nelson and Cheshire Ventures LLC, by counsel, hereby waive oral argument on their Motion To Require Plaintiffs To File and Serve a Partially Unredacted Copy of Exhibit 2 to the Second Amended Complaint and To Expedite Briefing.

Dated: October 30, 2020

Respectfully submitted,

/s/

Eric R. Nitz (Va. Bar No. 82471)  
MOLOLAMKEN LLP  
The Watergate, Suite 500  
600 New Hampshire Avenue, N.W.  
Washington, D.C. 20037  
(202) 556-2021 (telephone)  
(202) 536-2021 (facsimile)  
enitz@mololamken.com

Justin V. Shur (admitted *pro hac vice*)  
Caleb Hayes-Deats (admitted *pro hac vice*)  
MOLOLAMKEN LLP  
The Watergate, Suite 500  
600 New Hampshire Avenue, N.W.  
Washington, D.C. 20037  
(202) 556-2000 (telephone)  
(202) 556-2001 (facsimile)  
jshur@mololamken.com  
chayes-deats@mololamken.com

Jennifer E. Fischell (admitted *pro hac vice*)  
MOLOLAMKEN LLP  
430 Park Avenue  
New York, New York 10022  
(212) 607-8174 (telephone)  
(212) 607-8161 (fax)  
jfischell@mololamken.com

*Counsel for Defendants Carleton Nelson  
and Cheshire Ventures LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. On October 30, 2020, I will further cause the document and a notification of such filing (NEF) to be sent to the following parties by e-mail or mail:

Travis Stuart Andrews (Va. Bar No. 90520)  
Luke Michael Sullivan (Va. Bar No. 92553)  
Elizabeth P. Papez  
Patrick F. Stokes  
Claudia M. Barrett  
GIBSON DUNN & CRUTCHER LLP  
tandrews@gibsondunn.com  
lsullivan@gibsondunn.com  
epapez@gibsondunn.com  
pstokes@gibsondunn.com  
cbarrett@gibsondunn.com

*Counsel for Plaintiffs*

Kevin Bedell  
kbbedell@outlook.com

*Counsel for Author of Ex. 2*

Dated: October 30, 2020

Jeffrey R. Hamlin (Va. Bar No. 46932)  
George R. Calhoun  
James Trusty  
IFRAH PLLC  
jhamlin@ifrahlaw.com  
george@ifrahlaw.com  
jtrusty@ifrahlaw.com

*Counsel for Defendants Brian Watson and  
WDC Holdings LLC, Sterling NCP FF,  
LLC, Manassas NCP FF, LLC, and NSIPI  
Administrative Manager*

Casey Kirschner  
635 N. Alvarado Lane  
Plymouth, MN 55447

*Pro se*

\_\_\_\_\_/s/  
Eric R. Nitz (Va. Bar No. 82471)  
MOLOLAMKEN LLP  
The Watergate, Suite 500  
600 New Hampshire Avenue, N.W.  
Washington, D.C. 20037  
(202) 556-2021 (telephone)  
(202) 536-2021 (facsimile)  
enitz@mololamken.com

*Counsel for Defendants Carleton Nelson  
and Cheshire Ventures LLC*